


Exhibit 3

From: Anthony Jenkins <anthony@aswtlawyers.com>
Sent: Friday, March 17, 2023 7:40 PM
To: Mueller, Nicole C.
Cc: Wylie, Joseph; Brotman, Kenn; Conklin, Michelle R.; Richard S. Cornfeld; daniel@ghalaw.com; roxie@ghalaw.com; Robert M. Partain
Subject: RE: James Jilek deposition
Attachments: Plaintiff Jilek's Amended response to interogs 4 and 5.pdf

External Sender:

Nicole,

- Here's the link with second document production (credit statements)  [Jilek000023 - Jilek000314](#)
- This includes statements with no charges—I didn't give instructions to remove those, that's why they're included, and I thought you'd appreciate getting them all now instead of having to wait until Monday, my assistant just finished and he's leaving now
- Attached is James's draft amended supplemental response to interrogatories 4 and 5, I anticipate servicing these on Monday with the verifications.

ANTHONY JENKINS | [ARIAS SANGUINETTI WANG & TORRIJOS](#) | (310) 844-9696

From: Anthony Jenkins
Sent: Friday, March 17, 2023 1:56 PM
To: Mueller, Nicole C. <Nicole.Mueller@klgates.com>
Cc: Wylie, Joseph <joseph.wylie@klgates.com>; Brotman, Kenn <kenn.brotman@klgates.com>; Conklin, Michelle R. <Michelle.Conklin@klgates.com>; Richard S. Cornfeld <rick@ghalaw.com>; daniel@ghalaw.com; roxie@ghalaw.com; Robert M. Partain <robert@aswtlawyers.com>
Subject: RE: James Jilek deposition

Nicole,

- I have James's additional credit card statements, we're redacting them now, you should have them by the end of the day
- I have James's amended response to interrogatory nos. 4 and 5, you should have them by Monday, but I'll be sending you the draft amended responses today
- my proposed amendments to the complaint are attached, I should be able to get them to you in a final form by Monday—I'm requesting that your side stipulate to leave to amend
- Finally, can Rick listen in on the deposition on the telephone conference line in your conference room?

ANTHONY JENKINS | [ARIAS SANGUINETTI WANG & TORRIJOS](#) | (310) 844-9696

From: Anthony Jenkins
Sent: Thursday, March 16, 2023 12:16 PM
To: Mueller, Nicole C. <Nicole.Mueller@klgates.com>
Cc: Wylie, Joseph <joseph.wylie@klgates.com>; Brotman, Kenn <kenn.brotman@klgates.com>; Conklin, Michelle R. <Michelle.Conklin@klgates.com>; Richard S. Cornfeld <rick@ghalaw.com>; daniel@ghalaw.com; roxie@ghalaw.com; Robert M. Partain <robert@aswtlawyers.com>
Subject: James Jilek deposition

Nicole,

I can confirm James and I are ready to go on 3/21. If you want to move it, that's no problem.

Do you have time for a quick call to discuss—

- James has more bank statements and before his deposition I'm going to get you those and his amended interrogatory responses that he made purchases going back to 2017 when he started working at the 1730 East Holly, and that the correct building address is 1730 East Holly. I'll try and get that to you by tomorrow, Monday at the latest
- I am also going that you stipulate to the Court granting us leave to amend to correct the typo re the building address (1730 not 1739), alleging his purchases go back to 2017, and clarifying that the July 29, 2019 purchase was a test purchase meaning he took a picture of the machine with the prices so you could compare the price on the machine to the purchase amount depicted on his bank statement

I'm not asking to move James deposition, but it might make sense to do in light of the above.

I can call you, or here's my cell 714.675.1258. I can talk today anytime except 2 to 3pm.

Thx.

ANTHONY JENKINS | [ARIAS SANGUINETTI WANG & TORRIJOS](#) | (310) 844-9696

From: Mueller, Nicole C. <Nicole.Mueller@klgates.com>

Sent: Thursday, March 16, 2023 10:22 AM

To: Richard S. Cornfeld <rcornfeld@cornfeldlegal.com>

Cc: Wylie, Joseph <joseph.wylie@klgates.com>; Daniel S. Levy <daniel@ghalaw.com>; Roxanna K. Laswell <roxie@ghalaw.com>; Robert M. Partain <robert@aswtlawyers.com>; Anthony Jenkins <anthony@aswtlawyers.com>; Brotman, Kenn <kenn.brotman@klgates.com>; Conklin, Michelle R. <Michelle.Conklin@klgates.com>

Subject: RE: George Moore deposition

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Rick,

We are now less than one week away from the proposed dates for Mr. Moore's rescheduled deposition. Please provide us the courtesy of a response.

Nicole

From: Mueller, Nicole C.

Sent: Wednesday, March 15, 2023 9:10 AM

To: 'Richard S. Cornfeld' <rcornfeld@cornfeldlegal.com>

Cc: Wylie, Joseph <Joseph.Wylie@klgates.com>; 'Daniel S. Levy' <daniel@ghalaw.com>; 'Roxanna K. Laswell' <roxie@ghalaw.com>; 'Robert M. Partain' <robert@aswtlawyers.com>; 'Anthony Jenkins' <anthony@aswtlawyers.com>

Subject: RE: George Moore deposition

Rick,

When can we expect confirmation on Mr. Moore's rescheduled deposition date?

Thanks,
Nicole

From: Mueller, Nicole C.
Sent: Monday, March 13, 2023 9:25 AM
To: 'Richard S. Cornfeld' <rcornfeld@cornfeldlegal.com>
Cc: Wylie, Joseph <Joseph.Wylie@klgates.com>; Daniel S. Levy <daniel@ghalaw.com>; Roxanna K. Laswell <roxie@ghalaw.com>; Robert M. Partain <robert@aswtlawyers.com>; Anthony Jenkins <anthony@aswtlawyers.com>
Subject: RE: George Moore deposition

Rick,

We can alternatively offer next Wednesday (March 22) or Thursday (March 23) for Mr. Moore's deposition, and keep Mr. Jilek's deposition on March 21. At this point, that is preferable to re-arranging travel to Los Angeles for this week.

Thanks,
Nicole

From: Richard S. Cornfeld <rcornfeld@cornfeldlegal.com>
Sent: Monday, March 13, 2023 9:23 AM
To: Mueller, Nicole C. <Nicole.Mueller@klgates.com>
Cc: Wylie, Joseph <joseph.wylie@klgates.com>; Daniel S. Levy <daniel@ghalaw.com>; Roxanna K. Laswell <roxie@ghalaw.com>; Robert M. Partain <robert@aswtlawyers.com>; Anthony Jenkins <anthony@aswtlawyers.com>
Subject: RE: George Moore deposition

Nicole, just want to let you know we're checking on this.

From: Mueller, Nicole C. <Nicole.Mueller@klgates.com>
Sent: Friday, March 10, 2023 10:10 AM
To: Richard S. Cornfeld <rcornfeld@cornfeldlegal.com>
Cc: Wylie, Joseph <joseph.wylie@klgates.com>; Daniel S. Levy <daniel@ghalaw.com>; Roxanna K. Laswell <roxie@ghalaw.com>; Robert M. Partain <robert@aswtlawyers.com>; Anthony Jenkins <anthony@aswtlawyers.com>
Subject: RE: George Moore deposition

Rick,

I'm sorry to hear about Mr. Moore's mother.

Let's switch weeks for the depositions of Mr. Moore and Mr. Jilek. Mr. Moore's deposition would go forward on March 21 in St. Louis and we can take Mr. Jilek's deposition on Tuesday, Wednesday, or Thursday of next week in Los Angeles.

I'm available until 12:30p and after 3p CT today to discuss by phone.

Nicole

From: Richard S. Cornfeld <rcornfeld@cornfeldlegal.com>
Sent: Friday, March 10, 2023 9:34 AM

To: Mueller, Nicole C. <Nicole.Mueller@klgates.com>

Cc: Wylie, Joseph <joseph.wylie@klgates.com>; Daniel S. Levy <daniel@ghalaw.com>; Roxanna K. Laswell <roxie@ghalaw.com>; Robert M. Partain <robert@aswtlawyers.com>; Anthony Jenkins <anthony@aswtlawyers.com>

Subject: George Moore deposition

Nicole, I am sorry but we are going to have to reschedule George Moore's deposition. His mother left the hospital this week after having several toes amputated, and George is taking care of her. He told me that the week after next, his sister-in-law is coming to help out, so we could reschedule it for that week or later. I know we have Jilek on Tuesday, so it'd have to be after that. Please give me two or three dates, and I'll let you know what works. Again, I am sorry about this. Rick

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